

## Exhibit C

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June 23, 2025

**Via Email:** [rodneyolivermusic@gmail.com](mailto:rodneyolivermusic@gmail.com)

Mr. Rodney David Oliver  
11074 Oso Avenue  
Chatsworth, CA 91311

***Re: The Barry White Family Trust U/A/D: December 19, 1980, By its Duly Empowered Trustees v. Cooley et al. Case No. 24-cv-07509-DLC***

Dear Mr. Oliver:

We write in connection with your letter dated June 13, 2025, sent on and received by us on June 14, 2025, which requested a reply within ten (10) days. Notwithstanding that you gave us that deadline, you have filed a discovery letter with the Court which in no manner complies with Judge Cote's rules and we will so advise the Court. While you indicate in your June 13, 2025 letter that you are willing to meet and confer, you have taken no steps to provide dates for any such meet and confer.

Turning to your letter to Judge Cote (Dkt. 115), in Item No. 1, you claim you were not provided with deposit copies, we direct your attention to Bates Nos. 1306-1312.

In connection with Item No. 2, we have advised you, in writing, that we are prepared to turn over confidential documents to you subject to Ms. Key signing the Confidentiality Order (Dkt. 102). You have admitted she is the co-owner of the materials at the heart of this case. While you represent to Judge Cote that Ms. Key is currently unavailable due to serious health concerns, Ms. Key remains active on social media in connection with this case, posting as recently as June 12, 2025. More importantly, the "Egnyte" feature shows that there were two people who accessed the documents. One of the recipients who accessed the file shows an IP address located just a block away from Ms. Key's address. Please confirm the identities of the two people who accessed the documents.

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In connection with Item No. 3, we have not yet exchanged expert reports which are due August 15, 2025.

In connection with Item No. 4, we did produce a privilege log, and we direct your attention to pages 1315-1316 of our document production dated June 13, 2025.

In connection with Item no. 5, there is a pending motion in connection with that matter.

In response to your specific inquiries on the interrogatories, we stand by the answers to each of our interrogatories.

If you are available for a meet and confer, please advise of times and dates on which you are available. We believe in view of all that has transpired to date, that the Parties should hire a court reporter to transcribe that conversation, and that the costs be shared equally.

This letter is written with a full reservation of our client's rights and remedies, all of which are hereby expressly reserved.

Very truly yours,

HERBSMAN HAFER WEBER  
& FRISCH, LLP

Dorothy M. Weber, Esq.

DMW/rr